



Edwin L. Mongan <Edwin.L.Mongan-1@USA.dupont.com> on 09/12/2002
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To: NCIC OPPT/DC/USEPA/US@EPA, hpv.crtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA
cc:

Subject: Revised Glycolic Acid (CAS# 79-14-1) HPV Test Plan submission

Attached is the revised Glycolic Acid (CAS# 79-14-1) HPV test plan and robust summary in response to comments received from the EPA. Please let me know if you need further information.

Regards,

Ed Mongan
Manager, Environmental Stewardship
(See attached file: revised glycolic acid submission.pdf)

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- revised glycolic acid submission.pdf



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April 4, 2002

Christine Whitman, Administrator
U.S. Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

Attention: Chemical Right-to-Know Program

Re: EPA Comments on the Test Plan and Robust Data Summary for Glycolic Acid (CAS No.79-14-1)

Dear Administrator Whitman:

We received EPA's comments on DuPont's test plan and robust data summary for the chemical Glycolic acid (CAS No. 79-14-1) and are pleased to respond. We have considered the recommended revisions to the ecotoxicity studies and the environmental fate and health effects and EPA's specific comments on the robust data summaries, and we have revised our submittal as noted on the attached summary sheet. The revised robust data summary is also attached to this submittal.

If you have any questions about our response, please contact:

Edwin L. Mongan, III
Manager, Environmental Stewardship
DuPont Company
1007 Market Street, D-6082
Wilmington, DE 19898
Phone: (302) 773-0910
E-mail: edwin.L.mongan-1@usa.dupont.com

Sincerely,

Edwin L. Mongan, III
Manager, Environmental Stewardship
DuPont Safety, Health, & Environment
Excellence Center

ELM:ria
Attachment

CC: Charlie Auer

Summary of Changes to DuPont's Test Plan and Robust Data Summary

Glycolic Acid (CAS No. 79-14-1)

4/2/02

Ecotoxicity

EPA comment: EPA considers the algal study to be inadequate to allow an evaluation because the algal test was done in a closed system using growth medium not containing sodium bicarbonate as an oxygen source. Algal tests done in this manner are not recommended by OECD guidelines.

Response: Data from recently completed algal study following OECD Guideline 201 and Commission Directive 92/69/EEC Method C3 was added, and previously listed study was included as an additional reference.

Environmental Fate

EPA comment: The submitter needs to provide half-life-input data for transport between environmental compartments (fugacity).

Response: Requested data were added to the robust summary.

Health Effects

EPA comment: Robust summaries lack the following information: Clinical signs (severity, duration, and time of onset), statistical methods used, and guideline followed (if any).

Response: Where available, data was added to address the missing information.